
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES – GENERAL

Case No.: 5:23-cv-01731-JLS-RAO

Date: October 24, 2023

Title: Mary A. Kan v. General Motors LLC

initial matter, Plaintiff forfeited these arguments. *Zamani v. Carnes*, 491 F.3d 990, 997 (9th Cir. 2007) (“The district court need not consider arguments raised for the first time in a reply brief.”). In any event, both fail. First, Defendant attached to its notice of removal a proof of service showing that Defendant received Plaintiff’s complaint on August 7, 2023; Defendant did not need to reattach that proof of service when opposing Plaintiff’s amorphous motion. (See State Court Documents, Doc. 1-2 at 15.) Second, “[p]ersonal knowledge can be inferred from an affiant’s position” in a company, and the Court assumes that a lawyer in Defendant’s general counsel’s office is aware of basic corporate-structure facts, including where Defendant’s parent corporation is incorporated and has its principal place of business. *Self-Realization Fellowship Church v. Ananda Church of Self-Realization*, 206 F.3d 1322, 1330 (9th Cir. 2000).

Initials of Deputy Clerk: gga